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In the Matter of:

: UNITED STATES BANKRUPTCY
COURT DISTRICT OF NEW JERSEY

Roberto Hurtado : Honorable Rosemary Gambardella

: CASE NO. 18-14391

Debtor : CHAPTER 13

**OBJECTION TO APPLICATION FOR EARLY TERMINATION OF LOSS
MITIGATION PERIOD**

I, Russell L. Low, being of full age, hereby certify the following:

1. I represent the above-mentioned debtor, Roberto Hurtado in this current bankruptcy proceeding.
2. The debtor filed a Motion for Approval to Participate in the Court's Loss Mitigation Program on April 30, 2018.
3. The debtor was denied an extension of Loss Mitigation on December 12, 2019.
4. There has been a change in the debtor's circumstances which made it nearly impossible to bring forward requested documents.
5. The debtor is asking for the opportunity to have his time in the court's loss mitigation program be extended so he can provide financial statements and resubmit a package successfully.

Dated: December 17, 2019

/s/ Russell L. Low, Esq.
RUSSELL L. LOW, ESQ.
Attorney for Debtor